

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: Kelli McKenna

Debtor

MIDFIRST BANK

Movant

vs.

Kelli McKenna

Respondent

BK NO. 22-11505 ELF

Chapter 13

Hearing Date: 8/30/2022

**OBJECTION OF MIDFIRST BANK
TO CONFIRMATION OF CHAPTER 13 PLAN**

MIDFIRST BANK (hereinafter Secured Creditor), objects to confirmation of Debtor's Chapter 13 plan and asserts in support of its Objection as follows:

1. The claims bar date is August 18, 2022. Secured Creditor intends to file a claim on or before the bar date with pre-petition arrears estimated at \$13,461.95.
2. Debtor's Plan provides for payment in the amount of \$10,000.00 towards the arrearage claim of the Secured Creditor.
3. Debtor's Plan understates the amount of the Secured Creditor's claim by \$3,461.95, and does not provide sufficient funding to pay said claim including present value interest.
4. Accordingly, Debtor's Plan is not feasible, as it does not fully compensate the Secured Creditor.
5. In addition, the Debtor's Plan fails to comply with 11 U.S.C. §§ 1322 and 1325.

WHEREFORE, the Secured Creditor, MIDFIRST BANK, prays that the Court deny confirmation of the Debtor's Plan.

Respectfully submitted,

Date: July 29, 2022

By: **/s/ Rebecca A. Solarz, Esquire**

Rebecca A. Solarz
KML Law Group, P.C.
BNY Mellon Independence Center
701 Market Street, Suite 5000
Philadelphia, PA 19106
215-627-1322
Attorney for Movant/Applicant